

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IMMANUEL UNITED CHURCH  
OF CHRIST**

**VS.**

**PHILADELPHIA INDEMNITY  
INSURANCE COMPANY,  
ENGLE MARTIN & ASSOCIATES,  
INC., JOHN MILLER and  
SUSAN SABOUNI**

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**CASE NO. 4:17-cv-1329**

**ON REMOVAL FROM:**

**CAUSE NO. 2017-25426**

**IMMANUEL UNITED CHURCH  
OF CHRIST**

**VS.**

**PHILADELPHIA INDEMNITY  
INSURANCE COMPANY,  
ENGLE MARTIN & ASSOCIATES,  
INC., JOHN MILLER and  
SUSAN SABOUNI**

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IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

164<sup>TH</sup> JUDICIAL DISTRICT

**EXHIBIT "2"**

**AFFIDAVIT OF ENGLE MARTIN & ASSOCIATES, INC.**  
**IN SUPPORT OF REMOVAL**

**AFFIDAVIT OF DONALD L. OUZTS**

THE STATE OF GEORGIA §

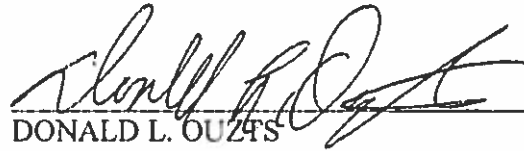
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COUNTY OF FULTON §


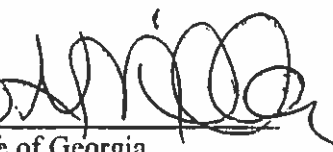
BEFORE ME, the undersigned authority, personally appeared DONALD L. OUZTS, known to me to be the person whose name is subscribed below, and who upon his oath stated as follows:

1. "My name is appeared Donald L. Ouzts. I am over the age of twenty-one years and competent to make this affidavit.
2. I am the Executive Vice President -- Claims Support Group for Engle Martin & Associates, Inc. ["EMA"]. In that capacity, I am authorized to make this affidavit, which is based upon personal knowledge. The statements made herein are true and correct.
3. EMA is an independent insurance claim adjusting company.
4. EMA is a corporation, which is incorporated under the laws of the state of Georgia.
5. EMA maintains its principal place of business at 5565 Glenridge Connector, NE, Suite 900, Atlanta, Georgia 30342. That is also the address of the office building where I work for EMA.
6. At no time since EMA was first incorporated has it ever maintained its principal place of business in Texas.
7. Attached to this affidavit is a true and correct copy of the current listing from the Texas Department of Insurance website for EMA. It correction identifies that company as a foreign company authorized to engage in the business in Texas. It also correctly states that the company's "home state" is Georgia.
8. EMA consents to Philadelphia Indemnity Insurance Company's removal of the lawsuit numbered and styled as Cause No. 2017-25426, *Immanuel United Church of Christ v. Philadelphia Indemnity Insurance Company, et al.*, from the 164th District Court of Harris County, Texas to the United States District Court for the Southern District of Texas.

Further, Affiant sayeth not.”

  
DONALD L. OUZTS

SUBSCRIBED AND SWORN to before me on this the 21 day of April,  
2017, to certify which witness my hand and seal of office.

   
Notary Public, State of Georgia